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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**TRIDENT HOLDING COMPANY, LLC, et al.,
Debtors.¹**

Chapter 11

**Case No. 19-10384 (SHL)
(Jointly Administered)**

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON AUGUST 21, 2019 AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Location of Hearing: Honorable Sean H. Lane, Courtroom 701, United States
Bankruptcy Court, Southern District of New York, One Bowling
Green, New York, NY 10004

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Trident Holding Company, LLC (6396); American Diagnostics Services, Inc. (2771); Community Mobile Diagnostics, LLC (9341); Community Mobile Ultrasound, LLC (3818); Diagnostic Labs Holdings, LLC (8024); FC Pioneer Holding Company, LLC (6683); JLMD Manager, LLC (8470); Kan-Di-Ki LLC (6100); Main Street Clinical Laboratory, Inc. (0907); MDX-MDL Holdings, LLC (2605); MetroStat Clinical Laboratory – Austin, Inc. (4366); MX Holdings, LLC (8869); MX USA, LLC (4885); New Trident Holdcorp, Inc. (4913); Rely Radiology Holdings, LLC (3284); Schryver Medical Sales and Marketing, LLC (9620); Symphony Diagnostic Services No. 1, LLC (8980); Trident Clinical Services Holdings, Inc. (6262); Trident Clinical Services Holdings, LLC (1255); TridentUSA Foot Care Services LLC (3787); TridentUSA Mobile Clinical Services, LLC (0334); TridentUSA Mobile Infusion Services, LLC (5173); U.S. Lab & Radiology, Inc. (4988). The address of the Debtors' corporate headquarters is 930 Ridgebrook Road, 3rd Floor, Sparks, MD 21152.

Copies of Motions and Applications: Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004, or (iii) from the Debtors' notice and claims agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/Trident> or by calling 1-800-960-1226. Note that a PACER password is needed to access documents on the Court's website.

I. ADJOURNED MATTERS

1. **First Omnibus Objection:** Debtors' First Omnibus Objection to Claims (Incorrectly Classified Claims) [Docket No. 418] (Date Filed: 5/14/19)

Related Documents:

- a. Notice of Adjournment of Hearing on Debtors' Objection to Claims Filed by Beckman Coulter, Inc. [Docket No. 787] (Date Filed: 8/14/19)

Objection

Deadline: June 6, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended until June 20, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/
Responses Filed:

- b. Response to Debtors First Omnibus Objection to Claims as to Beckman Coulter, Inc. [Docket No. 505] (Date Filed: 6/7/19)

Status: This matter has been adjourned until a date to be determined.

2. **Committee Challenge Budget Motion:** Motion of the Official Committee of Unsecured Creditors to Increase Challenge Budget as Set Forth in the Final DIP Financing Order [Docket No. 483] (Date Filed: 6/3/19)

Related Documents:

- a. Notice of Adjournment of Hearing of Motion of the Official Committee of Unsecured Creditors to Increase Challenge Budget as set Forth in the Final DIP Financing Order [Docket No. 577] (Date Filed: 6/19/19)

Objection

Deadline: June 20, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended until July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: This matter has been adjourned until a date to be determined.

3. **Abrahamson Relief From Stay Motion:** Motion of Bridget Faith Abrahamson for Comfort Order Confirming No Stay is in Effect or, in the Alternative, Motion for Relief From the Automatic Stay [Docket No. 704] (Date Filed: 7/24/19)

Related

Documents:

- a. Notice of Presentment of Stipulation and Agreed Order Between Debtors and Bridget Faith Abrahamson Modifying Automatic Stay to Permit Continuation of Prepetition Action to Extent of Available Insurance Proceeds [Docket No. 779] (Date Filed: 8/14/19)
- b. Notice of Adjournment of Hearing on Motion for Comfort Order Confirming No Stay is in Effect or, in the Alternative, Motion for Relief From the Automatic Stay [Docket No. 796] (Date Filed: 8/15/19)

Objection

Deadline: August 14, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended until September 10, 2019 at 4:00 p.m. (Prevailing Eastern Time).

Objections/

Responses Filed: None at the time of filing this agenda.

Status: This matter has been adjourned until a date to be determined but will be withdrawn if no objection is filed prior to the Objection Deadline, as listed on the notice of presentment.

4. **Gregie Relief From Stay Motion:** Motion of Movants Janine Gregie and Richard Gregie to Lift Automatic Stay [Docket No. 746] (Date Filed: 8/1/19)

Related

Documents:

- a. Notice of Adjournment of Hearing on Motion to Lift Automatic Stay [Docket No. 788] (Date Filed: 8/14/19)

Objection

Deadline: August 14, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None at the time of filing this agenda.

Status: This matter has been adjourned until a date to be determined.

5. **Estimation Motion:** Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to Establish Claims Estimation Procedures for *Qui Tam* Claims [Docket No. 705] (Date Filed: 7/24/19)

Related

Documents:

- a. Memorandum Endorsed Order [Docket No. 709] (Date Filed: 7/25/19)
- b. Notice of Status Conference Regarding Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to Establish Claims Estimation Procedures for *Qui Tam* Claims [Docket No. 710] (Date Filed: 7/25/19)
- c. Notice of Hearing Regarding Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to Establish Claims Estimation Procedures for *Qui Tam* Claims [Docket No. 754] (Date Filed: 8/2/19)

Objections/

Responses Filed: None at the time of filing this agenda.

Status: This matter has been adjourned until a date to be determined.

II. CONFIRMATION MATTERS

6. **Plan of Reorganization:** Modified Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 630] (Date Filed: 7/3/19)

Objection

Deadline: June 17, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed:

- a. Texas Health and Human Services Commission's Limited Objection to Confirmation of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization [Docket No. 548] (Date Filed: 6/14/19)
- b. Limited Objection of Metrostat to Plan of Schryver Medical Sales and Marketing, LLC [Docket No. 549] (Date Filed: 6/14/19)

- c. Objection of Invesco Credit Partners Fund, L.P. and Invesco Credit Partners Fund-A, L.P. to Confirmation of the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 553] (Date Filed: 6/17/19)
- d. Objection of United States Trustee to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC, and Its Debtor Affiliates [Docket No. 557] (Date Filed: 6/17/19)
- e. Objection of the Official Committee of Unsecured Creditors to Confirmation of the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 558] (Date Filed: 6/17/19)
- f. Eisenhower Medical Center's Limited Objection to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 559] (Date Filed: 6/17/19)
- g. Limited Objection of Element Fleet Corporation to Confirmation of the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 560] (Date Filed: 6/17/19)
- h. Limited Objection of Terri Vineyard, Individually and on Behalf of the Estate of Carol Nolan, Deceased to Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 561] (Date Filed: 6/17/19)
- i. Relator Ravi Srivastava's Objection and Joinder to the Objection of the Official Committee of Unsecured Creditors to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 566] (Date Filed: 6/17/19)
- j. Objection of the United States of America to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 586] (Date Filed: 6/17/19)
 - i. Declaration of William Waldron in Support of Objection of the United States of America to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 587] (Date Filed: 6/17/19)
- k. Alamo's Limited Objection to Confirmation of Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 644] (Date Filed: 7/3/19)
- l. Texas Health and Human Services Commission's Joinder in Part to the Objection of the United States of America to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 700] (Date Filed: 7/22/19)

Related
Documents:

m. Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 386] (Date Filed: 5/8/19)

Status: This matter has been adjourned until a date to be determined.

7. **Rule 3018(a) Motion:** Rule 3018(a) Motion to Temporarily Allow Metrostat Sellers' Claim For Voting on Chapter 11 Plan of Schryver Medical Sales and Marketing, LLC [Docket No. 454] (Date Filed: 5/24/19)

Objection

Deadline: July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None at the time of filing this agenda.

Status: This matter has been adjourned until a date to be determined.

III. ADVERSARY MATTERS

8. **United States of America et al. ex rel. Ravi Srivastava v. Trident Holding Company, LLC et al., Adv. Case No. 19-01143:** Adversary Complaint to Determine Nondischargeability of Debt Under Section 1141(d)(6) of the Bankruptcy Code [Adv. Docket No. 1] (Date Filed: 5/20/19)

Related
Documents:

a. Debtors' Motion to Dismiss Mr. Srivastava's Adversary Complaint to Determine Nondischargeability of Debt Under Section 1141(d)(6) of The Bankruptcy Code [Adv. Docket No. 12] (Date Filed: 6/20/19)

b. Relator Ravi Srivastava's Opposition to Debtors' Motion to Dismiss Mr. Srivastava's Adversary Complaint to Determine Nondischargeability of Debt Under Section 1141(d)(6) of the Bankruptcy Code [Adv. Docket No. 25] (Date Filed: 7/25/19)

c. Statement of Interest of the United States of America in Connection with Debtors' Motion to Dismiss the Adversary Complaint [Adv. Docket No. 26] (Date Filed: 7/25/19)

i. Declaration of AUSA Joel M. Sweet [Adv. Docket No. 27] (Date Filed: 7/25/19)

Status: This matter has been adjourned until a date to be determined.

9. **United States of America ex rel. Peter Goldman against Symphony Diagnostic Services No. 1, LLC, d/b/a MobilexUSA, Adv. Case No. 19-01142:** Amended Adversary Complaint to Determine Dischargeability of Debt Pursuant to U.S.C. § 1141(d)(6) [Adv. Docket No. 2] (Date Filed: 5/21/19)

Related Documents:

- a. Debtors' Motion to Dismiss Mr. Goldman's Amended Adversary Complaint to Determine Dischargeability of Debt Pursuant to U.S.C. § 1141(d)(6) [Adv. Docket No. 5] (Date Filed: 6/20/19)
- b. Response to Debtors' Motion to Dismiss Goldman's Amended Adversary Complaint to Determine Dischargeability of Debt Pursuant to 11 U.S.C. 1141(d)(6) [Adv. Docket No. 13] (Date Filed: 7/25/19)
- c. Statement of Interest of the United States of America in Connection with Debtors' Motion to Dismiss the Adversary Complaints [Adv. Docket No. 14] (Date Filed: 7/25/19)
 - i. Declaration of AUSA Joel M. Sweet [Adv. Docket No. 15] (Date Filed: 7/25/19)

Status: This matter has been adjourned until a date to be determined.

10. **Capital Finance Opportunities 1701C, LLC against Trident Holding Company, LLC et al., Adv. Case No. 19-01145:** Adversary Complaint [Adv. Docket No. 1] (Date Filed: 5/22/19)

Related Documents:

- a. Debtor Defendants and D&O Defendants Parrish and Smith's Motion to Dismiss Plaintiff's Adversary Complaint Under Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(b)(6) [Adv. Docket No. 11] (Date Filed: 6/10/19)
 - i. Memorandum of Law of Debtor Defendants and D&O Defendants Parrish and Smith in Support of Their Motion to Dismiss Plaintiff's Adversary Complaint [Adv. Docket No. 12] (Date Filed: 6/10/19)
- b. Defendants Silver Point Finance, LLC and SPCP Group, LLC's Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 16] (Date Filed: 6/10/19)
 - i. Memorandum of Law of Defendants Silver Point Finance, LLC and SPCP Group, LLC in Support of Their Motion to Dismiss the

Capital Finance Opportunities Adversary Complaint
[Adv. Docket No. 17] (Date Filed: 6/10/19)

- ii. Declaration of Robert A. Britton in Support of Defendants Silver Point Finance, LLC and SPCP Group, LLC's Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 10] (Date Filed: 6/10/19)
- c. Manager Defendants' Motion to Dismiss Adversary Complaint [Adv. Docket No. 18] (Date Filed: 6/11/19)
 - i. Declaration of Matthew L. McGinnis in Support of Manager Defendants' Motion to Dismiss Adversary Complaint [Adv. Docket No. 13] (Date Filed: 6/10/19)
- d. Plaintiff's Omnibus Memorandum of Law in Opposition to the Motions to Dismiss Plaintiff's Adversary Complaint of: (I) Silver Point Defendants, (II) Debtor Defendants and D&O Defendants Parrish and Smith, and (III) Manager Defendants [Adv. Docket No. 25] (Date Filed: 6/21/19)
- e. Debtors' Reply to Plaintiff's Omnibus Memorandum of Law in Opposition to the Motions to Dismiss Plaintiff's Adversary Complaint of: (I) Silver Point Defendants, (II) Debtor Defendants and D&O Defendants Parrish and Smith, and (III) Manager Defendants [Adv. Docket No. 28] (Date Filed: 6/25/19)
- f. Manager Defendants' Reply in Support of Motion to Dismiss Adversary Complaint [Adv. Docket No. 27] (Date Filed: 6/25/19)
- g. Reply of D&O Defendants Parrish and Smith in Support of the Motions to Dismiss Plaintiff's Adversary Complaint [Adv. Docket No. 29] (Date Filed: 6/25/19)
- h. Defendants Silver Point Finance, LLC and SPCP Group, LLC's Reply Memorandum in Further Support of Their Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 30] (Date Filed: 6/25/19)

Status: This matter has been adjourned until a date to be determined.

11. **Silver Point Finance, LLC et al. against Capital Finance Opportunities 1701C, LLC, Adv. Case No. 19-01161:** Adversary Complaint [Adv. Docket No. 1] (Date Filed: 5/29/19)

Status: This matter has been adjourned until a date to be determined.

IV. MATTERS GOING FORWARD

12. **Motion to Compel:** Beckman Coulter, Inc.'s Motion for Entry of an Order Compelling Assumption or Rejection of Leases Pursuant to 11 U.S.C. § 365 or in the Alternative, Granting Adequate Protection or Relief from the Automatic Stay [Docket No. 528] (Date Filed: 6/11/19)

Objection

Deadline: July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed:

a. Debtors' Statement in Response to Beckman Coulter, Inc.'s Motion for Entry of an Order Compelling Assumption or Rejection of Leases Pursuant to 11 U.S.C. §365 or in the Alternative, Granting Adequate Protection or Relief from the Automatic Stay [Docket No. 654] (Date Filed: 7/8/19)

Status: This matter is going forward.

13. **Exclusivity Motion:** Second Motion to Extend Exclusivity Period for Filing a Chapter 11 Plan and Disclosure Statement [Docket No. 768] (Date Filed: 8/7/19)

Related

Documents:

a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Second Motion for an Order Extending the Debtors' Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances Thereof [Docket No. 799] (Date Filed: 8/16/19)

Objection

Deadline: August 14, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

V. FEE MATTERS

14. Notice of Hearing on First Interim Applications for Compensation for Services Rendered and Reimbursement of Expenses of Professionals [Docket No. 750] (Date Filed: 8/1/19)

Related Documents:

- a. First Application of Togut, Segal & Segal LLP As Co-Counsel for the Debtors for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Expenses from February 10, 2019 through May 31, 2019 [Docket No. 662] (Date Filed: 7/10/19)
- b. First Interim Application of Ankura Consulting Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred As Financial Advisor to the Debtors for the Period from February 10, 2019 through May 31, 2019 [Docket No. 665] (Date Filed: 7/10/19)
- c. First Interim Application of PJT Partners LP As Investment Banker to the Debtors and Debtors In Possession for Allowance of Compensation for Services Rendered and for the Reimbursement of All Actual and Necessary Expenses Incurred for the Period of February 10, 2019 through May 31, 2019 [Docket No. 666] (Date Filed: 7/10/19)
- d. AlixPartners, LLP's First Interim Application for the Period February 21, 2019 through May 31, 2019 for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors [Docket No. 667] (Date Filed: 7/10/19)
- e. First Fee Application of RSM US LLP, As Auditor to the Debtors, for Interim Allowance and Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from February 10, 2019 through June 10, 2019 [Docket No. 668] (Date Filed: 7/10/19)
- f. First Interim Application of Kilpatrick Townsend & Stockton LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Official Committee of Unsecured Creditors for the Period from February 20, 2019 through and Including May 31, 2019 [Docket No. 669] (Date Filed: 7/10/19)
 - i. Supplement to the First Interim Application of Kilpatrick Townsend & Stockton LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Official Committee of Unsecured Creditors for the Period from February 20, 2019 Through and Including May 31, 2019 [Docket No. 696] (Date Filed: 7/19/19)

g. First Interim Fee Application of Skadden, Arps, Slate, Meagher & Flom LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Debtors for the Period of February 10, 2019 Through and Including May 31, 2019 [Docket No. 670] (Date Filed: 7/10/19)

Objection

Deadline: August 14, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed:

h. Response Of The United States Trustee Regarding Fee Applications For First Interim Awards Of Compensation And Reimbursement Of Out-Of-Pocket Expenses [Docket No. 790] (Date Filed: 8/14/19)

Status: This matter is going forward with respect to all of fee applications with the exception of the disputed fees in connection with the Skadden fee application.

Dated: August 19, 2019
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ James J. Mazza, Jr. _____

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